EXHIBIT L

Ercolini, Michael

From:	Ercolini, Michael
Sent:	Wednesday, April 07, 2021 2:56 AM
To:	kvpsingular@keker.com; wgs-singularv.google@wolfgreenfield.com; abhansali@kblfirm.com
Cc:	Singular
Subject:	-12551 Singular Select Email Hit Counts
Attachments:	2021-04-07 (-12551) Email Hit Counts for Selected Terms.pdf

Counsel,

We are attaching email hit counts for 115 of the 476 disaggregated search terms that Google recently served for Joseph Bates. We are also including hit counts for 5 of the 466 disaggregated terms Google served for Mssrs. Arnold, Steyck and Beal. As for the remaining disaggregated terms, we are in the process of reviewing emails responsive to those terms and will be producing them to Goggle on a rolling basis subject to our review.

As requested, we have removed a number of large family attachments consisting of program files from the searches, as reflected in these counts. Of course, this fails to resolve the central issues we continue to have with Google's requests, which evince a clear intent to abuse this process by maximizing Singular's review and production efforts, without regard for proportionality, and to use this as an unprecedented excuse refusing to produce Google's own witnesses.

While Singular will agree to work with Google on a modest proposal for some of these remaining terms, we will not continue to entertain requests of the nature we have received thus far. This includes at least the following non-exhaustive list of inappropriate requests:

-Blueshift: the name of Singular's prosecution firm, found in its email address domain and in signature lines. Effectively, this amounts to a request for all emails from Singular to its prosecution counsel over ten years. As you already know, Singular owns several times as many patents as the three that are currently in suit. We will not produce in response to this term, and do not expect that Google can find a suitable set of delimiters to cure the problem. The same goes for the term Plotkin.

-Terms common to non-asserted patent specifications: Google has requested emails responsive to terms used throughout the specifications for several non-asserted patents. This amounts to a request for emails concerning the prosecution of every United States patent owned by Singular, and a large proportion of foreign patents. Unless Google will delimit these terms to specific issues in this case, we will not produce in response to them.

-Intrinsix, MIT, Hammerstrom, DARPA, Stecyk, Kent, etc: these amount to wholesale email and/or email domain requests. We will not produce in response to them. Please suggest appropriate delimiters concerning specific issues if you wish Singular to respond to these terms.

Singular intends to complete its review and production of emails by early May. If Google wishes to revise any of these remaining terms, please provide final terms no later than Monday, April 12. Please be advised, however, that as Singular is currently reviewing and producing in response to over 300 separate terms (reaching several thousand emails), we do not intend to entertain more than 20 additional disaggregated search terms. Moreover, should any of those final requests be intended, as many of Google's prior terms have been, to end run the "narrowly tailored to specific issues" requirement, we do not intend to respond to those terms. Google has had ample time since it served its requests to meet the letter and spirit of this requirement for email requests, and we have repeatedly insisted that Google do so. Instead, Google has continually broadened its terms and employed tactics designed to sweep as many emails as possible into Singular's review, requesting terms such as "patent" and the name of the producing company or custodian.

Please let us know if you have any questions and we look forward to receiving Google's final terms and to closing this process out very soon.

Best regards,
Michael J. Ercolini
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Joseph Bates – Custodial Email Search Results

Term	Email Hit Count	Hit Count (with Family)
"APE"	4,191	9,944
"Charles River"	6,080	7,119
"CRA"	6,565	8,280
"DOD"	2,348	3,457
"DOE"	328	1,783
"input signal*"	1,145	2,408
"MAD-HATTER"	1,156	1,559
"MIT"	16,290	23,457
"processing element*"	2,817	8,828
(dep* pre/2 defense)	503	1,154
(dep* W/2 defense)	554	1,214
(dep* W/2 energy)	213	1,525
(evaluat* w/5 tech*)	914	1,730
(evaluat* W/5 tech*)	914	1,730
(media pre/2 lab)	3,418	5,083
approx* W/10 precis*	813	3,717
approx* W/3 process*	761	4,946
approximat* pre/3 comput*	7,410	11,951
approximat* pre/3 process*	647	4,723
approximat* W/3 comput*	7,564	12,997
approximat* W/3 process*	727	4,861
ASIC*	5,758	12,042
Astro	617	721
BAE	5,819	8,952
baesystems	865	1,486
Blueshift*	1,745	2,549

Cadence*	3,116	4,796
CAVE	3,383	4,020
Colwell	786	1,217
DARPA w/25 agree*	1,020	1,660
DARPA w/25 collaborat*	538	904
DARPA w/25 consider*	433	704
DARPA w/25 evaluat*	697	1,269
DARPA w/25 fund*	3,393	6,345
DARPA w/25 meet*	1,354	1,812
DARPA w/25 project*	1,509	2,705
DARPA w/25 propos*	1,482	1,976
DARPA w/25 report*	650	1,041
DARPA w/25 review*	980	1,819
DARPA w/25 test*	793	1,324
Dean	759	1,346
digital w/5 deterministic	635	1,374
emulator*	4,231	10,835
exponent w/25 mantissa	688	2,954
exponent w/25 precis*	293	2,120
exponent w/25 range	367	1,007
float* W/3 arithmet*	1,791	8,132
float* W/3 operat*	890	2,067
float* w/5 core	247	1,594
float* W/5 core	247	1,594
float* w/5 operat*	1,346	2,940
FPGA*	5,610	13,717
Fujitsu w/25 agree*	536	1,042
GlobalFoundries	716	1,921
google* w/25 agree*	322	541

google* w/25 bf*	318	725
google* w/25 brain	326	521
google* w/25 collaborat*	218	313
google* w/25 consider*	219	292
google* w/25 deal	180	240
google* w/25 evaluat*	126	185
google* w/25 fund*	272	869
google* w/25 invest*	164	240
google* w/25 licens*	217	352
google* w/25 meet*	707	1,125
google* w/25 patent	354	743
google* w/25 project*	314	714
google* w/25 propos*	164	204
google* w/25 report*	132	326
google* w/25 review*	211	298
google* w/25 tensor	162	319
google* w/25 test*	197	516
google* w/25 TPU	418	887
Hammerstrom	2,011	2,658
input* w/5 "non-deterministic"	141	330
input* w/5 deterministic	201	631
Intrinsix	14,819	19,112
Kanade	1,118	2,347
Kent	2,381	3,512
kjarnold	2,010	2,399
licens* w/10 patent	1,042	1,786
mantissa*	893	3,492
mass* pre/2 institute	1,162	2,318
mass* W/2 institute	1,166	2,324

media W/2 lab	3,418	5,083
MOSIS	1,819	3,230
Office w/3 Naval	582	1,181
ONR	4,940	6,760
OpenEXR	233	535
OpenGL	335	888
Plotkin	5,277	7,151
processing pre/2 element*	2,817	8,828
processing W/2 element*	2,886	9,181
Stecyk	5,937	7,422
Struever	1,500	1,706
Swetha	1,301	2,382
systolic*	211	469
table* W/10 *bit	206	629
table* W/10 bit*	431	3,519
table* W/10 log*	255	2,710
Takeshi	115	1,103
Teller	486	571
Tenenbaum	636	1,283
Tensor*	1,022	2,379
TPU*	927	1,494
USC	517	1,095
Varadarajan	412	1,913
Vertex*	204	3,278
VLSI	556	2,526
Xilinx	1,819	5,153

(Intrinsix) Kent Arnold – Custodial Email Search Results

Kent	1,738	1,918

kjarnold	1,844	1,939
Stecyk	755	861
ASIC*	543	582
Cadence*	512	555

(Intrinsix) Mark Beal – Custodial Email Search Results

Kent	907	1,059
kjarnold	900	986
Stecyk	2,607	2,862
ASIC*	937	1,084
Cadence*	805	893

(Intrinsix) Steve Stecyk – Custodial Email Search Results

Kent	863	1,012
kjarnold	758	848
Stecyk	4,779	5,285
ASIC*	1,362	1,693
Cadence*	885	1,051